

Message

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Sent: 12/8/2010 12:20:23 AM
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Subject: GE Feedback from Brackett Dennison

Brackett Dennison called today to respond to a number of questions he and I have been discussing. He made the following points:

1. EPA's guidance is explicit that some residual contamination is unavoidable for dredging remedies, regardless of the number of passes.
2. GE believes that our 10 percent metric of success erroneously assumes that the three units which were capped because of time constraints in Phase 1 would otherwise have had no capping, and therefore the calculations on which our 10 percent limit is based are overly conservative. (I said that I had a different understanding and hoped we could clear up the confusion before tomorrow's meeting).
3. GE calculates that overall PCB mass removal for their metric of success (18 percent) would be 97 percent, while the comparable percentage for our metric of success (10 percent) would be 98 percent.
4. GE believes that the increment of PCBs that would be left in the river under their approach as compared to ours would not compromise the remedy because it would not be bioavailable as a result of the capping.
5. Most importantly, GE believes the cost increase from reducing the metric of success from 18 percent to 10 percent would be between \$300 and \$700 million, although he stressed that this is a preliminary estimate. Brackett indicated that GE is now assuming that the total cost of the remedy (before these increases) would be around \$2B.

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